

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
Amendment of Part 97 of the Commission's ) RM-10413  
Amateur Service Rules Governing )  
Operating Privileges )  
 )

REPLY COMMENTS OF HANS BRAKOB, K0HB

OVERVIEW

These comments REPLY specifically to the comments of Timothy J. Fiebig, K2TF.

I. Discussion:

While Mr. Fiebig's comments fly the flag of "experimentation and progress", I feel they would have three undesirable consequences if adopted as written.

A. LITTLE ROOM FOR THE PROPOSED EXPERIMENTATION "PARK"

In other comments on RM-10413 I have suggested that the current "Novice" CW segments on 10, 15, 40, and 80 meters ought to be assigned to an "experimental park". This would provide significant space (375 kHz) spread over 4 HF bands.

Mr. Fiebig suggests the "experimental park" be limited to "25-50 kHz". This would amount to just a token allocation, and would be of limited use since it would likely exist in only one (or perhaps two) of the HF bands.

A wider range of frequency choices ought to be provided to give experimenters access to the different propagation characteristics of several HF bands.

B. NOVICE CW SEGMENTS WOULD REMAIN

Part of the reason for the unpopularity of the Novice license and its decline in recent years is that the current allocations tend to isolate Novices into small ghetto's away from mainstream amateur operations. Thus the few remaining Novice licensees have fewer and fewer opportunities for contacts, and they are isolated from the advantage of interaction with more experienced amateurs in the 'mainstream' parts of the bands, damping their inclination to remain active and upgrade their skills.

Mr. Fiebig's proposal does not remove the current Novice

CW ghetto's; it simply diminishes their size and relocates them slightly in the band, effectively reinforcing the sense of 'second class RF citizens' of these licensees.

#### C. DIMINISHES SPECTRUM FOR DIGITAL OPERATIONS

While Mr. Fiebig "talks the talk" for promoting digital operations, his proposal in fact diminishes the amount of space available to digital modes by establishing large "CW exclusive" segments in areas where digital operations are now allowed.

This serves to elevate the protection given to Morse operation, establishes an exclusive CW turf which does not now exist, a precedent which is undesirable for the future growth of digital modes.

#### II. Summary

Mr. Fiebig's proposal would:

1. Give only token space to new experimentation.
2. Perpetuate the "Novice ghetto syndrome".
3. Diminish the amount of spectrum available to digital operations.

Rather than move amateur radio forward, these factors actually are regressive, and the proposal should be dismissed.

Respectfully,

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